EXHIBIT
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From: Fred D. Gray Jr. <fgrayjr@glsmgn.com>
To: <CKWhitehead@tmgslaw.com>
CC: <KLThomas@tmgslaw.com>,<rsjones@tmgslaw.com>,<ggrasso@grassolaw.com>
Subject: RE: MCI v. Warren discovery - privilege log
Attachments: (none)

Date:Friday, May 04, 2007 3:33 PM

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Chris:

This is a final attempt to resolve the discovery dispute(s) pertaining to your responses to Sheriff Warren's Second Request for Production of Documents. We believe plaintiffs have failed and refused to produce certain documents. If I misrepresent any of our previous converstion, please advise.

RFP No. 2. I have asked for a signed contract between Frank Thomas and/or plaintiffs, or either of them and James Lane. In addition to your written response, you stated that you will check and see if there is a signed agreeement. To date, you have not furnished one. If there is a signed agreeement, please so advise and furnish immediately.

RFP 3-5. With respect to legal bills identified and requested, you state that you stand by your objection that this is attorney-client privilege and work prodcut protected.

RFP 6. With respect to contracts, etc. that pertain to Joe Turnham, you have produced all documents in your possession. You verbally added, upon my request for clarification, that you have produced everything you have and you do not have anything else responsive to this request.

RFP 7. Cell phone records of Frank Thomas from November 2004 to present - you stand by your objection. I mentioned my narrowing the scope of the request to which you reiterated that you would not produce any such records and will stand by your objection.

RFP 11. Contract, consulting agreement and evidence of payment to Donald Watkins. You stated that no such documents exist at this time. If such documents now exist, kindly advise and produce immediately.

RFP 13. All minutes of Reach One, Teach One for calendar years 2004, 2005, 2006. You state plaintiff has no such documents in its possession at this time. Is this still the case?

RFP 29, 31. Records of all accounts of Frank Thomas at Colonial Bank and Sterling Bank including check, bank statements, all loan records, promissory notres, mortgages, financial statements and the like for the past five (5) years. You stand on your objection.

35. Copies of all correspondence, including e-mails, between the plaintiffs or either of them, or Frank Thomas and Joe Turnham, Jame Lane and Donald Watkins. You state that plaintiffs have not such documents in its possession at this time.

While this list is not exhaustive of all that was discusssed, nor is it exhaustive of the requests for which no documents have been produced by plaintiffs, we are making one final request that you verify and produce as requested.

Kind regards,

Fred
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From: "Whitehead, Christopher K." <CKWhitehead@tmgslaw.com>
Sent: Thursday, May 03, 2007 10:52 AM
To: "Fred Gray, Jr." <fgrayjr@glsmgn.com>
Subject: RE: MCI v. Warren discovery - privilege log

Fred, I am attaching the privilege log